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A PROFESSIONAL LIMITED LIABILITY COMPANY

MEMO Docket

February 23, 2024

Via ECF Only

Hon. Colleen McMahon
United States Magistrate Judge
Southern District of New York
40 Foley Square
New York, New York 10007

RE: Mark Turley v. Cleany Corporation.
Docket No. 23-cv-09218

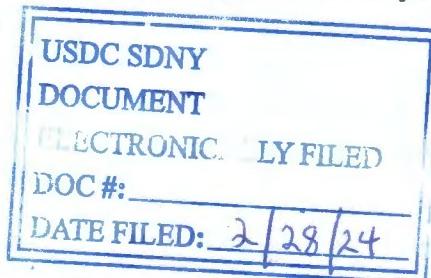
Your Honor:

This office represents Plaintiff Mark Turley ("Plaintiff") in the above-referenced matter. As per Your Honor's Individual Rules, the Parties jointly write to the Court regarding this matter and the Parties' intent to stay discovery pending the outcome of mediation.

Pursuant to the SDNY mandatory mediation program, the parties were assigned mediator Fred Perkins. The parties conferred with the mediator and scheduled the mediation for April 17, 2024, the earliest date available for all parties. As it relates to this, the Parties respectfully request that the remainder of the discovery schedule be stayed pending the outcome of the mediation, as means to keep costs low for the clients, which will assist in obtaining a more reasonable resolution. Additionally, the parties are hopeful the case will resolve at the mediation. The Parties also respectfully request that they be permitted to provide an update on the mediation process two weeks after the mediation is held.

This is the Parties first request to stay the discovery schedule. The stay will affect all subsequent discovery deadlines and conferences.

We thank Your Honor for your time and consideration.



Respectfully Submitted,

PHILLIPS & ASSOCIATES, PLLC

/s/ Alexander Zugaro, Esq.
Alexander Zugaro, Esq.

cc: Attorneys for Defendant (Via ECF)